The Honorable Barbara J. Rothstein 1 2 3 4 5 UNITED STATES DISTRICT COURT 6 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 7 SHANNON SPENCER, individually and on No. 2:23-cv-01790-BJR behalf of all others similarly situated, 8 STIPULATED MOTION TO REMAND 9 Plaintiff, AND ORDER 10 v. 11 CONIFER REVENUE CYCLE 12 SOLUTIONS, LLC, a Texas limited liability company doing business as CONIFER 13 HEALTH SOLUTIONS LLC AND CONIFER HEALTH, 14 15 Defendant. 16 17 Plaintiff Shannon Spencer ("Plaintiff") and Defendant Conifer Revenue Cycle Solutions 18 ("Defendant") (collectively, the "Parties"), by and through their respective undersigned 19 counsel, submit this Stipulated Motion to Remand and Proposed Order. 20 The Parties mediated this action with Clifford Freed of Washington Arbitration and 21 Mediation Services on May 23, 2024. The Parties agreed to settle the action and executed a CR 22 2A Agreement outlining the settlement terms. One such settlement term is remand to state court. 23 As such, the Parties respectfully request that this action be remanded to King County Superior 24 Court for completion of a class-wide settlement. 25 26 EMERY | REDDY, PLLC STIPULATED MOTION TO REMAND AND 600 Stewart Street, Suite 1100 ORDER - 1 Seattle, WA 98101

No. 2:23-cv-01790-BJR

PHONE: (206) 442-9106 • FAX: (206) 441-9711

1	Respectfully submitted this 30 th day of Ma	y, 2024.
2		
3	EMERY REDDY, PLLC	OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.
4	By: /s/ Timothy W. Emery	
5	By: <u>/s/ Patrick B. Reddy</u> By: <u>/s/ Paul Cipriani</u>	By: <u>/s/ Adam T. Pankratz</u> Adam T. Pankratz, WSBA #50951
6	Timothy W. Emery, WSBA #34078	Ogletree, Deakins, Nash, Smoak & Stewart, P.C.
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15		
16		I certify that this memorandum contains less
17		than 15 pages, in compliance with the Court's Standing Order.
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	STIPULATED MOTION TO REMAND AND ORDER – 2	EMERY REDDY, PLLC 600 Stewart Street, Suite 1100 Seattle, WA 98101

No. 2:23-cv-01790-BJR

Seattle, WA 98101 PHONE: (206) 442-9106 • FAX: (206) 441-9711 STIPULATED MOTION TO REMAND AND ORDER – 3

No. 2:23-cv-01790-BJR

ORDER

Upon consideration of the Parties' Stipulated Motion to Remand, the Court finds that good cause exists to remand this action to King County Superior Court. It is hereby ORDERED, ADJUDGED, and DECREED that this Motion is GRANTED and that this action be remanded to King County Superior Court.

DATED this 31st day of May 2024.

Barbara J. ROTHSTEIN

UNITED STATES DISTRICT JUDGE

EMERY | REDDY, PLLC

600 Stewart Street, Suite 1100 Seattle, WA 98101

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STIPULATED MOTION TO REMAND AND ORDER – $4\,$

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